

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HARRISON HINES and ARGONAUTIC
VENTURES MASTER SPC,

Plaintiffs,

vs.

AZOTH INVESTMENT SPC LTD., YUCHEN SHI
a/k/a CASSANDRA SHI and TAMARA
FRANKEL,

Defendants.

DECLARATION OF CASSANDRA SHI

Pursuant to 28 U.S.C. § 1746, I, CASSANDRA SHI, hereby declare under penalty of perjury as follows:

1. I am the Chief Executive Officer of Azoth Investment SPV Ltd. ("Azoth"), a Defendant in this case.
2. I have served as CEO of Azoth since its founding in 2019.
3. Azoth is incorporated in Delaware, and has no presence in the State of New York.
4. In my capacity as CEO of Azoth only, I signed the purchase and sale agreements that give rise to Plaintiffs' allegations.
5. I reside in San Francisco, California and have done so since before the purchase and sale agreements were negotiated and executed.
6. I did not negotiate the purchase and sale agreements in New York.
7. I did not perform any of the services called for by the purchase and sale agreements in New York.
8. I was not in New York when I digitally executed the initial purchase and sale agreement, which is attached to the Complaint as Exhibit A, on March 2, 2021.

9. I was not in New York when I digitally executed the subsequent purchase and sale agreement, which is attached to the Complaint as Exhibit B, on March 18, 2021.

10. The purchase and sale agreements pertained to cryptocurrency tokens issued by a Swiss company.

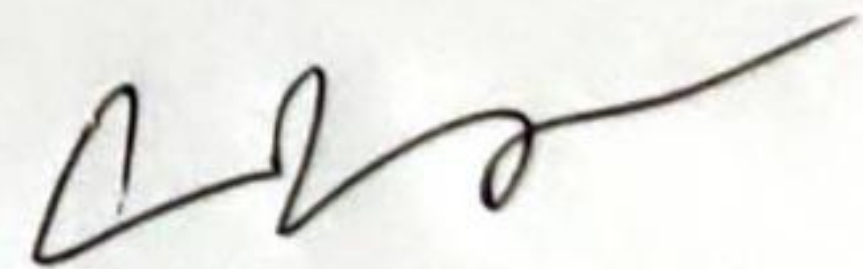
11. The Complaint characterizes certain communications between myself and Plaintiff Hines related to the transactions in the contracts. Although I dispute the characterization of certain of the communications, all of the quoted communications—to the extent that they occurred—were sent and received by me in places other than New York.

12. I do not possess a New York driver's license nor do I pay any taxes in the State of New York.

13. Although I dispute that I breached the contracts or am liable to Plaintiffs in any way, all of the conduct alleged—to the extent it occurred at all—occurred outside the State of New York.

14. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of January, 2022



Cassandra Shi